

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

C.A. NO. 04-12689-RWZ

JAMES P. CIESLUK,

Plaintiff

v.

THE TOWN OF BELLINGHAM, BRIAN D.  
KITCHER, PETER LEMON, EDWARD  
GUZOWSKI, JOHN MELANSON, GERARD L.  
DAIGLE and RICHARD PERRY,

Defendants

JOINT SCHEDULING STATEMENT

Pursuant to L.R. 16.1(D), counsel for the parties have conferred and state as follows:

I. PROPOSED SCHEDULING ORDER

The parties propose the following pre-trial schedule:

- A. Automatic Disclosures to be completed by April 14, 2005;
- B. All written discovery to be served by April 30, 2005.
- C. Depositions of fact witnesses to be completed by August 31, 2005.
- D. Plaintiff's expert witnesses to be designated by September 30, 2005;

defendants' expert witnesses to be designated by October 30, 2005. All expert depositions to be completed by November 30, 2005.

E. A status conference, to address the possible filing of dispositive motions or to serve as an initial pre-trial conference, will be held in December, 2005.

II. CERTIFICATIONS

L.R. 16.1 certifications of conferral will be filed separately.

III. ALTERNATIVE DISPUTE RESOLUTION

The parties do not consider this case appropriate for alternative dispute resolution at this time.

III. TRIAL BY MAGISTRATE

The parties do not consent to trial by magistrate

|   |  |
|---|--|
| <p>PLAINTIFF</p> <p>By his attorney,</p> <p><u>/s/Frances L. Robinson (jc)</u><br/>Frances L. Robinson (BBO#422910)<br/>Davis, Robinson &amp; White, LLP<br/>One Faneuil Hall Marketplace<br/>South Market Building -- Third Floor<br/>Boston, MA 02109</p> | <p>DEFENDANTS,</p> <p>By their attorneys,</p> <p><u>/s/Jackie Cowin</u><br/>Joseph L. Tehan, Jr. (BBO# 494020)<br/>Jackie Cowin (BBO# 655880)<br/>Kopelman and Paige, P.C.<br/>31 St. James Avenue<br/>Boston, MA 02116<br/>(617) 556-0007</p> |
|---|--|

245862/METG/0605